

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of )  
 )  
Communications Assistance for ) CC Docket No. 97-213  
Law Enforcement Act )

**COMMENTS OF AT&T CORP.  
REGARDING PUBLIC NOTICE ON  
CALEA TECHNICAL CAPABILITIES**

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## **SUMMARY**

AT&T respectfully submits these comments in response to the Commission's recent *Public Notice* regarding implementation of CALEA. AT&T urges the Commission to uphold the industry's safe harbor standard, J-STD-025. J-STD-025 reflects the combined technical opinion and efforts of the world's leading systems engineers and should only be overruled upon a clear showing of deficiency. Such a showing has not been made.

AT&T also urges the Commission to refrain from adopting the post-cut-through dialed digit extraction capability requested by the FBI. Requiring carriers to provide the post-cut-through capability clearly conflicts with the Commission's statutory obligations to "meet the assistance capability requirements of [CALEA] by cost-effective methods," "to minimize the cost of such compliance on residential ratepayers" and "to protect the privacy and security of communications not authorized to be intercepted." Post-cut-through dialed digit extraction may be the most difficult and costly of the punch list items to develop. Moreover, as has been clearly recognized by the courts, interception of such information is the interception of call content – not call-identifying information – and carriers should only be required to provide law enforcement with such information pursuant to a valid Title III order.

AT&T also supports the petition by the Cellular Telecommunications Industry Association that the Commission suspend the September 30, 2001 compliance date for certain assistance capabilities under CALEA. The Court's decision has created enormous uncertainty in the industry about how to proceed. A more sensible approach would be to suspend the September 2001 compliance deadline and establish a single compliance date at the end of the Commission's proceedings for all features that the Commission eventually determines are required by CALEA.

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Pursuant to the Commission's recent *Public Notice*,<sup>1</sup> AT&T Corp. and AT&T Wireless Group (collectively "AT&T") respectfully submit these comments in response to the issues raised by the Commission concerning implementation of the Communications Assistance for Law Enforcement Act of 1994 ("CALEA").<sup>2</sup> In the *Third Report and Order* in this proceeding,<sup>3</sup> the Federal Communications Commission ("FCC" or "Commission") adopted technical capabilities for wireline, cellular and broadband Personal Communications Services ("PCS") carriers to comply with the assistance capability requirements prescribed by CALEA. The Commission required that, for such carriers, all capabilities of J-STD-025 ("J-Standard"), the industry "safe harbor" standard, except packet-mode communications, should be implemented by

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<sup>1</sup> Commission Seeks Comments to Update the Record in the CALEA Technical Capabilities Proceeding, *Public Notice*, CC Docket No. 97-213, DA 00-2342 (rel. Oct. 17, 2000).

<sup>2</sup> Communications Assistance for Law Enforcement Act, Pub. L. No. 103-414, 108 Stat. 4279 (1994) (codified as amended in 18 U.S.C. § 2522, and 47 U.S.C. §§ 229, 1001-1010).

<sup>3</sup> In the Matter of the Communications Assistance for Law Enforcement Act, *Third Report and Order*, CC Docket No. 97-213, FCC 99-230 (rel. Aug. 31, 1999).

June 30, 2000 and that six of the nine “punch list” capabilities requested by the Department of Justice and the Federal Bureau of Investigation should be implemented by September 30, 2001. The Commission also required that such carriers implement a packet-mode capability, consistent with the interim standard, by September 30, 2001.

Several privacy and industry groups sought review of the Commission’s *Third Report and Order* in the United States Court of Appeals for the District of Columbia Circuit (the “Court”). Among other things, the petitioners challenged the requirements that carriers make available to law enforcement agencies the signaling information from custom calling features (such as call forwarding and call waiting), telephone numbers dialed after calls are connected, and data pertaining to digital packet-mode communications.

In a decision issued August 15, 2000, the United States Court of Appeals for the District of Columbia Circuit affirmed the Commission’s decision in part and vacated and remanded in part for further proceedings.<sup>4</sup> More specifically, the Court vacated and remanded to the Commission four of the six “punch list” capabilities mandated by the Commission’s *Third Report and Order*: (1) party hold/join/drop information on conference calls; (2) subject-initiated dialing and signaling information; (3) in-band and out-of-band signaling information; and (4) post-cut-through dialed digit extraction. The Court concluded that the Commission’s decision to include these four capabilities reflected a lack of reasoned decisionmaking. The Court found that the Commission had not: (1) explained the basis for its conclusion that these four capabilities are required by CALEA as call-identifying information; (2) identified any deficiencies in the J-Standard’s definition of call-identifying information; (3) explained how its order would satisfy

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<sup>4</sup> *United States Telecom Association, et al. v. Federal Communications Commission*, No. 99-1442, slip op. (D.C. Cir. Aug. 15, 2000).

CALEA's requirements by "cost-effective methods" or how its order would affect residential ratepayers; nor (4) explained how post-cut-through dialed digits would "protect the privacy and security of communications not authorized to be intercepted." The Court also affirmed the Commission's decision not to modify the packet-mode provisions of the J-Standard.

These portions of the *Third Report and Order* (which were vacated and remanded to the Commission) are the focus of the *Public Notice* to which AT&T hereby responds. It is important to note that, for a number of reasons, AT&T is not commenting on the packet data issues addressed in dicta in the Court's Order. First, because the Court affirmed the Commission and upheld those portions of J-STD-025 addressing packet data, discussion of such points would be irrelevant to the task before the FCC on remand. Second, the Commission's *Public Notice* did not request comment on the packet data issue. Third, the Commission has recently received a report from the Telecommunications Industry Association regarding surveillance of packet mode communications, which should be the subject of a future *Public Notice* or rulemaking proceeding.

#### **I. THE COMMISSION SHOULD NOT MODIFY J-STANDARD'S DEFINITION OF "CALL-IDENTIFYING INFORMATION"**

As noted by the Court, "[w]hether CALEA requires carriers to make available the four punch list capabilities turns on what [CALEA] means by 'call-identifying information.'"<sup>5</sup> Section 102(2) of CALEA defines "call identifying information" as "dialing or signaling information that identifies the origin, direction, destination, or termination of each communication generated or received by a subscriber by means of any equipment, facility, or

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<sup>5</sup> *Id.* at 6.

service of a telecommunications carrier.”<sup>6</sup> CALEA explicitly states that the obligation of a telecommunications carrier in regard to call-identifying information is to expeditiously isolate it and enable the government “to access call-identifying information that is reasonably available<sup>7</sup> to the carrier.”<sup>8</sup>

J-STD-025 adopted the statutory definition of “call-identifying information.”<sup>9</sup> It further defines the terms “origin, direction, destination, or termination” as follows:

- **Destination** – the number of the party to which a call is being made (*e.g.*, called party)
- **Direction** – the number to which a call is redirected or the number from which it came, either incoming or outgoing (*e.g.*, redirected-to party or redirected-from party)
- **Origin** – the number of the party initiating a call (*e.g.*, calling party)
- **Termination** – the number of the party ultimately receiving a call (*e.g.*, answering party).<sup>10</sup>

AT&T hereby continues its longstanding support of J-STD-025’s definition of call-identifying information. J-STD-025 reflects the combined expert technical opinions and efforts of dozens of the world’s leading systems engineers from a wide variety of carriers and manufacturers. As such, the definitions contained in the J-Standard reflect current industry

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<sup>6</sup> 47 U.S.C. § 1001(2).

<sup>7</sup> As noted in previous comments, AT&T believes that call-identifying information is “reasonably available” to a carrier when it is resident in the switch and collected for either call-processing purposes or other legitimate business needs. *See* Comments of AT&T Corp. at n. 22 (May 20, 1998).

<sup>8</sup> 47 U.S.C. § 1002(a)(2).

<sup>9</sup> J-STD-025, Section 3.0, Definitions.

<sup>10</sup> *Id.*

practice and the industry “know-how” that Congress wanted to explicitly incorporate in CALEA standards and wanted overruled only when a clear showing of deficiency has been made.

As noted by the Court, the Commission “identified no deficiencies in the J-Standard’s definitions of the terms ‘origin,’ ‘destination,’ ‘direction,’ and ‘termination.’”<sup>11</sup> The Court added that if it simply allowed “the Commission to modify the J-Standard without first identifying deficiencies, [the Court] would weaken the major role Congress obviously expected industry to play in formulating CALEA standards.”<sup>12</sup>

As AT&T has stated previously,<sup>13</sup> the J-Standard’s definition of these terms mirrors the intent of Congress as expressed in CALEA’s legislative history, which provides that for voice communications, “call-identifying information” is “the numbers dialed or otherwise transmitted for the purpose of routing calls through the carrier’s network.”<sup>14</sup> For pen register cases, Congress understood call-identifying information to be limited to “the numbers dialed from the facility that is the subject of the court order.”<sup>15</sup> Additionally, for trap and trace investigations, Congress limited call-identifying information to “the originating number of the facility from which the call was placed and which are captured when directed to the facility that is the subject of the court order.”<sup>16</sup>

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<sup>11</sup> *USTA, et al. v. FCC*, at 10.

<sup>12</sup> *Id.*

<sup>13</sup> *See e.g.*, Comments of AT&T Corp., at 6-7 (May 20, 1998).

<sup>14</sup> House Report, at 3501.

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

Because the standard is not deficient, the Commission should leave the J-Standard's definition of "call-identifying information" intact. Moreover, as discussed in the following section, the definition of "call-identifying information" should not be expanded to include post-cut-through dialed digits. Such digits are not call-identifying information. Rather, as noted by the Court, post-cut-through dialed digits are call content and entitled to greater privacy protection.

**II. GIVEN THE FCC'S STATUTORY OBLIGATIONS TO "PROTECT THE PRIVACY AND SECURITY NOT AUTHORIZED TO BE INTERCEPTED," THE FCC SHOULD REFUSE TO ADOPT THE POST-CUT-THROUGH DIALED DIGIT EXTRACTION CAPABILITY REQUESTED BY THE FBI**

Rather than further developing the already voluminous record that AT&T has created at the Commission urging the Commission not to add the enhanced surveillance features sought by the Federal Bureau of Investigation ("FBI") and the Department of Justice ("DOJ") to the assistance capability requirements of CALEA, AT&T hereby incorporates by reference its previous filings in this proceeding on the issues addressed in the *Public Notice*.<sup>17</sup> However, AT&T would like to take this opportunity to focus on one particular punch list item that was given added attention by the Court – post-cut-through dialed digit extraction.

Post-cut-through dialed digits are sent as an integral part of the voice portion of a connection. A carrier must access the voice channel (extracting part of the content of the call) in order to provide dialed digits to law enforcement. As noted by the Court, "the government

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<sup>17</sup> See e.g., Comments of AT&T Corp. Regarding Scope of CALEA Capabilities, CC Docket No. 97-213 (May 20, 1998); Reply Comments of AT&T Corp. Regarding Scope of CALEA Capabilities, CC Docket No. 97-213 (June 12, 1998); Comments of AT&T Corp. Regarding Further Notice of Proposed Rulemaking on CALEA Capabilities, CC Docket No. 97-213 (Dec. 14, 1998); Reply Comments of AT&T Corp. Regarding Further Notice of Proposed Rulemaking on CALEA Capabilities, CC Docket No. 97-213 (Jan. 27, 1999).

contends that a law enforcement agency may receive all post-cut-through digits with a mere pen register order, subject to CALEA's requirement that the agency uses 'technology reasonably available to it' to avoid processing digits that are content."<sup>18</sup> The Court asks the FCC to adjudicate the legality of this position on remand. The Court's request for reasoned decision-making with respect to post-cut-through dialed digit extraction highlights the importance of both the privacy and cost stipulations of CALEA.<sup>19</sup>

With regard to privacy, the pivotal question facing the Commission is whether a Title III warrant is required to permit extraction of all post-cut-through digits from the voice channel, when these digits are unquestionably the content of a communication. The Fourth Circuit was presented with a similar question in *Brown v. Waddell*.<sup>20</sup> In this case, the defendant, a member of the Durham, North Carolina, police force was instructed by his superiors to obtain legal authorization to use a clone pager to monitor the messages being received on the pagers of a suspected drug trafficker. To do so, the defendant prepared an affidavit, application, and order in the form appropriate under the Federal Electronic Communications Privacy Act of 1986 ("ECPA") and state law for obtaining authorization to install a pen register or trap and trace device. According to the Fourth Circuit, "[w]hile the sole purpose of the monitoring assignment was to obtain the telephone numbers of the persons paging the plaintiff, it is undisputed that the

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<sup>18</sup> *USTA et al. v. FCC*, at 12.

<sup>19</sup> Pursuant to 47 U.S.C. § 1006(b), if a deficiency petition is filed with the Commission regarding CALEA's technical requirements or industry standards, CALEA requires that the Commission establish, by rule, technical requirements or standards that: (1) protect the privacy and security of communications not authorized to be intercepted; (2) meet the assistance capability requirements of Section 103 [of CALEA] by cost-effective methods; and (3) minimize the cost of such compliance on residential ratepayers.

<sup>20</sup> *Brown v. Waddell*, 50 F.3d 285 (4th Cir. 1995).

defendant intercepted a number of numeric messages containing more extensive sets of numbers than those in telephone numbers, including at least one that was conceded to be a code indicating that a caller which it identified was ‘en route.’”<sup>21</sup>

The specific issue before the Fourth Circuit was whether a clone digital display pager used by a law enforcement officer to simultaneously monitor numeric messages received by a suspect’s digital display pager was effectively a “pen register.” The *Brown* court held that a clone digital display pager is not a pen register and that its use without a Title III order was unauthorized. The *Brown* court observed that a “pen register” is defined by statute as “a device which records or decodes electronic or other impulses which identify the numbers dialed or otherwise transmitted on the telephone line to which such device is attached.”<sup>22</sup> The court concluded that, “as a matter of plain textual meaning, a digital display pager clone does not itself fit this definition – in the critical sense that it is not a device attached to a telephone line.”<sup>23</sup> More importantly, however, the Fourth Circuit realized that while the function of a digital display pager is usually to display telephone numbers to which courts have ruled no legitimate expectations of privacy exist,<sup>24</sup> a digital display pager can receive and display a much larger set of numbers providing an unlimited range of number-coded substantive messages (*i.e.*, (“content”).<sup>25</sup>

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<sup>21</sup> *Id.* at 287-88.

<sup>22</sup> *Id.* at 290.

<sup>23</sup> *Id.* at 290-91.

<sup>24</sup> *See e.g., Smith v. Maryland*, 442 U.S. 735, 745 (1979).

<sup>25</sup> *Brown*, 50 F.3d at 292.

Given that simple numeric pagers that could receive and display only numbers and dashes with no transmission capability require a Title III order, AT&T sees no major distinction that would permit law enforcement to receive content-based messages, such as post-cut through digits, without first obtaining a Title III order. Just as the persons paging the plaintiff in *Brown* transmitted messages by entering Dual Tone Multi Frequency (“DTMF”) tones on a telephone connection to the plaintiff’s service, AT&T’s subscribers access their bank accounts, credit card facilities and other consumer services by entering DTMF tones on their telephone handsets. As has been clearly recognized by the courts,<sup>26</sup> interception of either set of tones is the interception of call content – not call-identifying information – and carriers should only be required to provide law enforcement with such information pursuant to a valid Title III order.

Even the Commission has concurred with this assessment in the context of packet-mode communications by stating that CALEA’s mandate to protect the privacy of communication not authorized to be intercepted

would seem to be violated if the carrier were to give [law enforcement] both call-identifying and call content information when only the former were authorized. Under those circumstances, [law enforcement] would be receiving call content information without having the requisite authorization.<sup>27</sup>

We recognize that, notwithstanding the view of the Court of Appeals, the Commission is no doubt reluctant to make a conclusive determination of law in a field that has not been the center of its institutional focus. In the current context, however, Congress has given the Commission broad directions that require the Commission to resolve uncertainties in favor of

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<sup>26</sup> See e.g., *USTA, et al. v. FCC*, at 12.

<sup>27</sup> *In the Matter of Communications Assistance for Law Enforcement Act*, CC Docket No. 97-213, Further Notice of Proposed Rulemaking, at ¶ 63 (rel. Nov. 5, 1998).

more privacy and lower implementation costs.<sup>28</sup> In light of these instructions, the Commission should adopt a reading of CALEA that protects privacy and reduces implementation costs for industry. Its ruling should be based on the working assumption that courts will conclude that a Title III order is required before carriers give law enforcement access to post-cut-through dialed digits.

While the concept of obtaining a Title III order to obtain post-cut-through digits may seem burdensome to law enforcement, in fact, the law enforcement community has had to obtain Title III orders in order to get access to paging messages for years. Moreover, there is no better way to uphold the privacy protection provisions of CALEA than to require a valid Title III order. To AT&T's knowledge, the added administrative burden and heightened evidentiary requirement that comes with a Title III order has never been an issue to the law enforcement community. It should not be now.

As discussed more thoroughly in the next section, such a reading by the Commission would avoid potentially unnecessary costs, because it would mean that there is no need to mandate this punch list feature. The reason is simple. If law enforcement must obtain a Title III order to intercept post-cut-through dialed digits, that same Title III order will also grant law enforcement the authority to intercept the subject's entire content channel. Given the current uncertain state of the law, the Commission should not force industry to spend millions of dollars building privacy-invading tools that may prove useless and entirely unnecessary if the courts adopt a privacy-protective reading of Title III.

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<sup>28</sup> See 47 U.S.C. § 1006(b)(1)-(3).

### **III. THE EXORBITANT COST OF IMPLEMENTING THE POST-CUT-THROUGH DIALED DIGIT EXTRACTION CAPABILITY CANNOT BE CONSIDERED COST-EFFECTIVE**

The Commission must also consider the exorbitant cost of providing the post-cut-through dialed digit extraction capability. Post-cut-through dialed digit extraction may be the most difficult and costly of the punch list items to develop for the simple reason that wireless carriers do not use DTMF tone decoders in call processing.<sup>29</sup> Rather, in wireless communications, numbers dialed are sent over the air interface after the subscriber hits the <SEND> key. In order to provide the post-cut-through dialed digit capability, DTMF tone extractors and decoders would be required for every surveillance target and every line potentially usable by that target with advanced calling features. AT&T has also been informed by its vendors that major software changes will be required for its switches, including significant changes in the engineering and capacity guidelines for the mobile switching centers to accommodate the additional hardware required for each surveillance.

Forcing carriers to implement the post-cut-through dialed digit extraction capability also raises capacity concerns because carriers must have the capability to match with DTMF decoders the number of simultaneous wiretaps the government contends it may have to invoke pursuant to its final capacity notice.<sup>30</sup> With hundreds of thousands of lines that may need to be tapped simultaneously under the FBI's capacity notice, and the typical decoder costing over \$200, the financial consequences of this tentative decision are enormous. The Commission has already ruled that, based on the manufacturers' aggregate revenue estimates, the cost of dialed digit

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<sup>29</sup> In wireline systems, tone decoder circuits are used to gather digits as they are pulsed from a landline phone.

<sup>30</sup> See *Implementation of the Communications Assistance for Law Enforcement Act*, Final Notice of Capacity, 63 Fed. Reg. 12218 (Mar. 12, 1998).

extraction would be 13% of the core interim standard and 29% of the total punch list.<sup>31</sup>

Nevertheless, the Commission went on to conclude, “in balancing these costs against other statutory requirements, [it does] not find them to be so exorbitant as to require automatic exclusion of the capability.”<sup>32</sup> Of course, extravagance is not the statutory standard.

AT&T strongly disagrees with the Commission’s seemingly flippant assessment. The cost of incorporating this feature will be staggering – far exceeding that of any other punch list capability. Furthermore, it is unclear whether the Commission’s figures reflect both software and hardware costs. If the cost figures do not include hardware costs, as AT&T suspects, the Commission can expect the total cost of implementing this feature to be significantly higher than has been estimated because of the massive cumulative effect of installing all of the DTMF equipment. Forcing carriers to implement such an expensive feature can hardly be considered cost-effective, nor would implementation of this feature do anything to “minimize the cost of [CALEA] compliance on residential ratepayers,” as CALEA directs.

Should the Commission rule that law enforcement is entitled to post-cut-through dialed digits under CALEA, AT&T recommends that the Commission consider requiring law enforcement to extract such digits using their own decoders. Although this would require agencies to purchase a limited number of tone decoding collection devices (and, in some cases, obtain a leased line to convey the content), it would be much less expensive and more efficient than requiring every switch in the nation to be overhauled to provide the dialed digit extraction capability. In fact, the FBI has already estimated that it could cost law enforcement agencies up

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<sup>31</sup> See *Third Report and Order* at ¶ 123. The five manufacturers’ aggregate revenue estimate for this capability was \$121 million. See *Public Notice*, CC Docket No. 97-213, DA 99-863 (rel. May 7, 1999).

<sup>32</sup> *Third Report and Order*, at ¶ 123.

to \$20 million per year to provide their own decoding – far less than the economic burden forced upon industry should carriers be responsible for providing and implementing thousands of DTMF decoders.<sup>33</sup>

#### **IV. THE COMMISSION MUST GRANT REASONABLE TIME AND CONDITIONS FOR COMPLIANCE WITH CALEA’S SECTION 103 ASSISTANCE CAPABILITY REQUIREMENTS**

These comments also give AT&T an opportunity to reiterate its support of the petition by the Cellular Telecommunications Industry Association (“CTIA”) that the Commission suspend the September 30, 2001 compliance date for certain assistance capabilities under CALEA.<sup>34</sup> The September 30, 2001 compliance date was set by the Commission’s *Third Report and Order*, which, as noted earlier, was vacated and remanded by the United States Court of Appeals for the District of Columbia Circuit to the Commission for further proceedings. As a result, no compliance date exists until the Commission acts on the Court’s remand, determines whether any of the capabilities are required under CALEA, and establishes a new compliance schedule, pursuant to section 107(b)(5) of CALEA.<sup>35</sup> However, for packet mode communications and the two punch list features that were not challenged in the appeal (“timing” and the “content of subject-initiated conference calls”), the September 2001 deadline still applies.

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<sup>33</sup> See Reply Comments Regarding Further Notice of Proposed Rulemaking by the Federal Bureau of Investigation and Department of Justice, CC Docket No. 97-213, at 64 (Jan. 27, 1999).

<sup>34</sup> Cellular Telecommunications Industry Association, *Petition to Suspend Compliance Date*, CC Docket No. 97-213, (Aug. 23, 2000); see also Comments of AT&T Corp. (Sept. 15, 2000)

<sup>35</sup> 47 U.S.C. § 1006(b)(5).

Carriers are devoting scarce engineering resources to comply with the rapidly approaching September 2001 deadline – now only ten months away. Not surprisingly, the Court’s decision has created enormous uncertainty in the industry about how to proceed. Carriers are uncertain whether to engage in the complex process of attempting to disentangle the software and hardware solutions for the four vacated features from the remaining capabilities, cease compliance work entirely, or proceed with development work on all six features and run the risk that they will subsequently have to modify their solution.

Moreover, if the FCC does not suspend the September 2001 deadline (but subsequently determines that some of the vacated punch list features are required by CALEA), carriers will face yet another CALEA capabilities upgrade cycle. Carriers are already having to make extraordinary efforts to manage three separate, CALEA-related upgrades in less than 15 months: the core J-STD-025, the capacity requirements (in March 2001) and the punch list (in September 2001). To further complicate this implementation schedule by requiring carriers to implement the two unchallenged punch list items and packet mode communications by September 2001, and then undergo a potential *fourth* installation (for any remaining punch list features the Commission mandates) would impose a tremendous and unfair technical and economic burden upon carriers. A more sensible approach would be to suspend the September 2001 compliance deadline and establish a single compliance date at the end of the Commission’s proceedings for all features that the Commission eventually determines are required by CALEA.<sup>36</sup>

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<sup>36</sup> Moreover, on September 29, 2000, the Telecommunications Industry Association (“TIA”) presented the Commission with a report on technical issues concerning CALEA compliance for packet mode communications. Given the complex technical issues discussed in this report as well as the legal and policy questions raised by the Court of Appeal’s decision, the Commission would be wise to suspend the packet mode compliance deadline until the Commission has all of the information it needs to establish a more realistic compliance regime.

**V. CONCLUSION**

For the forgoing reasons, AT&T respectfully urges the Commission to uphold the J-Standard's definition of call-identifying information, to reject the incorporation of any additional punch list items and to extend the deadline for compliance with CALEA's assistance capability requirements.

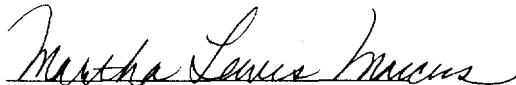
Respectfully submitted,

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Dated: November 16, 2000

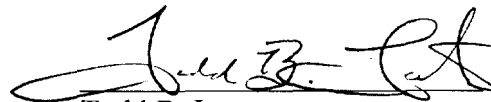
## **CERTIFICATE OF SERVICE**

I, Todd B. Lantor, an attorney in the law firm of Steptoe & Johnson, LLP, hereby certify that I have on this November 16, 2000 caused to be served by first class mail, postage prepaid, or by hand delivery, a copy of the foregoing Comments on FCC Public Notice to the following:

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